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 20 *BC Licensing, LLC, BCIP, LLC, Joshua Halpern, Matthew Silverman,*  
 21 *Perry Rogers, Samuel Stanovich, Corey Jenkins, and Matthew Piekarski*

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UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

16 BC LICENSING, LLC, a Nevada Limited  
 17 Liability company,

18 Plaintiff,

19 vs.

20 DMD CHICKEN, LLC, a Florida limited  
 21 liability company; FREDERICK BURGESS, an  
 22 individual; and JACK FLECHNER, an  
 23 individual,

24 Defendants.

25 DMD CHICKEN, LLC, a Florida limited  
 26 liability company,

27 Counterclaim Plaintiff,

28 vs.

29 BC LICENSING, LLC, a Nevada limited  
 30 liability company; BCIP, LLC, a Nevada limited  
 31 liability company; JRS HOSPITALITY, LLC, a

Case No.: 2:25-cv-00453-CDS-NJK

**STIPULATION AND ORDER FOR  
 AN EXTENSION OF THE  
 DEADLINE OF COUNTERCLAIM  
 DEFENDANT MATTHEW  
 PIEKARSKI TO FILE A  
 RESPONSIVE PLEADING TO  
 COUNTERCLAIMANTS'  
 AMENDED COUNTERCLAIM [ECF  
 NO. 44]  
 (FIRST REQUEST)**

1 Nevada limited liability company; PERRY  
2 ROGERS, an individual; SHAQUILLE  
3 O'NEAL, an individual; COREY JENKINS, an  
4 individual; JOSHUA HALPERN, an individual;  
MATTHEW SILVERMAN, an individual;  
SAMUEL STANOVICH, an individual, and  
MATTHEW PIEKARSKI, an individual,

5 Counterclaim Defendants.

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7 **STIPULATION AND ORDER FOR AN EXTENSION OF THE DEADLINE OF**  
**COUNTERCLAIM DEFENDANT MATTHEW PIEKARSKI TO FILE A RESPONSIVE**  
**PLEADING TO COUNTERCLAIMANTS' AMENDED COUNTERCLAIM [ECF NO. 44]**

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9 Defendants/counterclaimants DMD Chicken, LLC, Frederick Burgess, and Jack Flechner  
10 (collectively, "Counterclaimants") and counterclaim defendants BC Licensing, LLC, BCIP,  
11 LLC, Matthew Silverman, Corey Jenkins, Perry Rogers, Joshua Halpern, Samuel Stanovich, JRS  
12 Hospitality, LLC, and Shaquille O'Neal, along with counterclaim defendant Matthew Piekarski  
13 ("Counterclaim Defendant"), by and through their counsel of record, hereby stipulate and agree  
14 as follows:

15 1. On May 21, 2025, Counterclaimants filed an Amended Counterclaim against the  
16 counterclaim defendants BC Licensing, LLC, BCIP, LLC, Matthew Silverman, Corey Jenkins,  
17 Perry Rogers, Joshua Halpern, Samuel Stanovich, JRS Hospitality, LLC, and Shaquille O'Neal,  
18 along with the addition of Counterclaim Defendant [ECF No. 44] (the "Amended  
19 Counterclaim"). The Amended Counterclaim was filed as a matter of course under FRCP  
20 15(a)(1)(B).

21 2. Counterclaim Defendant was not previously listed as a party in the Counterclaim  
22 filed by Counterclaimants [ECF No. 6].

23 3. On June 13, 2025, service of process for Counterclaim Defendant was accepted  
24 initially by Mark D. Ferrario and Akke Levin of Greenberg Traurig, LLP on June 13, 2025. [ECF  
25 No. 57].

26 4. Based on the service date of June 13, 2025, the deadline to file a responsive  
27 pleading on behalf of Counterclaim Defendant is July 7, 2025, under FRCP 12(a)(1)(B).

28 5. On June 27, 2025, it was confirmed that Calvin E. Davis and Candice S. Nam of

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1 Gordon Rees Scully Mansukhani, LLP, through their local counsel Bradley G. Taylor of Gordon  
2 Rees Scully Mansukhani, LLP, would be representing Counterclaim Defendant. On July 2, 2025,  
3 verified petitions for Calvin E. Davis and Candice S. Nam to represent Counterclaim Defendant  
4 *pro hac vice* were filed. [ECFs Nos. 68, 69.]

5       6. There are currently pending two Motions to Dismiss the Amended Counterclaims,  
6 one filed on behalf of counterclaim defendants JRS Hospitality, LLC and Shaquille O'Neal [ECF  
7 No. 52], and one on behalf of counterclaim defendants BC Licensing, LLC, BCIP, LLC,  
8 Matthew Silverman, Corey Jenkins, Perry Rogers, Joshua Halpern, and Samuel Stanovich ECF  
9 No. 51].

10       7. Given the recent change in representation of Counterclaim Defendant, along with  
11 the pending Motions to Dismiss, the parties believe good cause exists to extend the deadline for  
12 Counterclaim Defendant to file a responsive pleading by fourteen (14) days, such that the  
13 deadline would now be July 21, 2025.

14       8. This is the first stipulation for extension of time to file a responsive pleading on  
15 behalf of Counterclaim Defendant. LR IA 6-1; LR 26-3.

16       9. This stipulation is made in good faith and not to delay the proceedings. The  
17 parties do not anticipate that the current Scheduling Order [ECF No. 65] amended on June 30,  
18 2025, will be impacted by this request.

19                   IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

21                   IT IS SO ORDERED.  
22                   Dated: July 3, 2025

23                     
24                   Nancy J. Koppe  
25                   United States Magistrate Judge  
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